

EXHIBIT 15

Kevin M. Kearney
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April 7, 2021

Edward Moss, Esq.
O'Melveny & Myers LLP
7 Times Square
New York, New York 10036

Dear Mr. Moss:

Re: Subpoena Duces Tecum served on Hodgson Russ
Pacific Alliance Asia Opportunity Fund, L.P., vs. Guo Wengui, et al.
Index No.: 652077/2017

In response to the subpoena received by Hodgson Russ in this matter, please find below the information appropriate for production under CPLR §§ 5223 and 5224. The firm objects to the subpoena to the extent it seeks information beyond the proper scope of discovery under these sections, and to the extent it seeks confidential information about clients other than the defendants in the underlying action, information protected by the attorney-client privilege.

The firm has represented Mr. Wengui in the following matters. In each instance, our engagement letter was addressed to Mr. Wengui, with a signature block for him.

1. *Soho China, Ltd., et al. v. Guo Wengui*, Index No. 155066/2017, Supreme Court of New York, New York County;
2. *Fan Bingbing v. Guo Wengui*, Index No. 156619/2017, Supreme Court of New York, New York County;
3. *Yan Huang v. Guo Wengui*, Index No. 156552/2017, Supreme Court of New York, New York County;
4. *Caixin Media Company, Ltd., et al. v. Guo Wengui*, Index No. 652154/2017, Supreme Court of New York, New York County;
5. *Pacific Alliance Opportunity Fund L.P. v. Kwok Ho Wan*, Index No. 652077/2017, Appellate Division, First Department of the Supreme Court of New York;
6. *Rui Ma v. Guo Wengui, et al.*, Index No. 158140/2017, Supreme Court of New York, New York County;



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7. *Weincan ("Watson") Meng and Boxun Inc., v. Guo Wengui a/k/a Miles Kwok*, Index No. 159636/2017, Supreme Court of New York, County of New York;
8. *Eastern Profit Corporation v. Strategic Vision US LLC, Civil Action No. 18-CV-2185*, United States District Court Southern District of New York;
9. *Zheng Wu a/k/a Bruno Wu and Yang Lan v. Guo Wengui* Index No. 152123/2018, Supreme Court of New York, County of New York; and
10. *Baiqiao Tang a/k/a Tang Baiqiao and Jing Geng v. Wengui, Guo, a/k/a Miles Kwok, a/k/a Guo Wengui, a/k/a Ho Wan Kwok, Golden Spring (New York), Ltd., Rule of Law Foundation III Inc., Rule of Law Society IV Inc., and Saraca Media Group, Inc.*, Supreme Court of New York, County of New York.

Payments received by the firm for its services were made by Golden Spring (New York) Ltd.

In addition, single payments were received from the following senders:

1. ZIBA Limited; and
2. ACA Capital Group Limited.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kevin M. Kearney".

Kevin M. Kearney
General Counsel

KMK/cat